

Tatyana Evgenievna Drevaleva
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San Francisco, CA, 94121
415-954-2116, tdrevaleva@gmail.com
Plaintiff in Pro Per

THE UNITED STATES DISTRICT COURT
FOR NORTHERN CALIFORNIA

)	Case No. 3:18-cv-03748-JCS
)	
Tatyana E. Drevaleva)	
)	
<i>Plaintiff,</i>)	Declaration to the Third Motion to
)	
vs.)	Strike Defendants' June 04, 2021 Answer
)	
1) The U.S. Department of Veterans)	to My Original June 25, 2018 Complaint
Affairs)	
)	in Its Entirety or Partially,
2) Mr. Denis Richard McDonough in his)	F.R.C.P. Rule 12(f.)
capacity as a Secretary of the U.S.)	
Department of Veterans Affairs)	
)	
810 Vermont Avenue, NW,)	Date: August 13, 2021
Washington, D.C. 20420)	
)	
<i>Defendant</i>)	Time: 09:30 AM
)	
Facility:)	Location: Courtroom F – 15th Floor
)	
New Mexico VA Healthcare System)	450 Golden Gate Avenue,
1501 San Pedro Drive, S.E.)	
Albuquerque, NM, 87108)	San Francisco, CA 94102
)	
)	Judge: The Hon. Chief Magistrate
)	
)	Judge Joseph C. Spero
)	
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I, Plaintiff Tatyana E. Drevalova, hereby declare:

- 1) I am a Plaintiff Pro Se and a Party in this action
- 2) I have personal knowledge of the facts stated herein, which are known by me to be true and correct, and I will testify competently thereto
- 3) I am respectfully asking to strike Zack's June 04, 2021 Answer in its entirety:
 - a) Because Zack **didn't** represent the true and genuine interests of true Defendants (1) the U.S. Department of Veterans Affairs and (2) Secretary McDonough
 - b) Because Zack represented the personal interests of Ms. Carla Dunkelberger and Mr. Phil Johnson who are **not** Defendants in the lawsuit No. 3:18-cv-03748-JCS
 - c) Because Zack filed the June 04, 2017 Answer in violation of 38 CFR § 14.514(a) without any evidence that:
 - (i) The General Counsel obtained the material facts of the case
 - (ii) The General Counsel coordinated with the U.S. Department of Justice regarding my lawsuit No. 3:18-cv-03748-JCS
 - (iii) The General Counsel instructed the Regional Counsel about whether or not any further action in my lawsuit No. 3:18-cv-03748-JCS is required
 - d) Because the June 04, 2021 Answer was unsworn in violation of 28 U.S.C. § 1746
 - e) Because the June 04, 2021 Answer was filed in violation of the F.R.C.P. Rule 11(b.)
- 4) As an alternative, I am respectfully asking to partially strike Zack's June 04, 2021 Answer for the reasons that I specified in my Third Motion to Strike
- 5) I am respectfully asking the Court to strike Zack's assertions that "Defendants" didn't know whether or not I sent multiple emails where I explained about the scope of my disability
- 6) I am respectfully asking the Court to strike Zack's assertions that "Defendants" didn't know whether or not they received my July 14, 2017 Second medical documentation.

1 I declare under the penalty of perjury and under the Federal laws that all foregoing is true
2 and correct. Executed at San Francisco, CA on July 04, 2021.

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4 Respectfully submitted,

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6 s/ Tatyana Drevaleva



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8 Plaintiff Pro Se

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10 July 04, 2021.
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